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July 25, 2023

BY ECF

The Honorable John G. Koeltl
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

**Re: *City of Almaty, Kazakhstan, et ano. v. Felix Sater, et al.,*
 Case No. 19 Civ. 2645 [rel. 15 Civ. 5345] (AJN) (KHP)**

Dear Judge Koeltl:

We represent Defendant MeM Energy Partners LLC (“MeM”) and write to oppose as premature Plaintiffs’ letter request today that the Court schedule a pretrial conference.

As we have repeatedly explained to Plaintiffs when the parties have met and conferred, the next step in this litigation is summary judgment. This is especially critical to the simplification of the issues and parties at trial in this case, where there is no genuine dispute as to any material fact, and MeM is entitled to judgment as a matter of law.

In order to propose a summary judgement briefing schedule that would accommodate all parties, we sought to confer with the primary defendants to ascertain whether they were intending to file a pre-motion letter. We have not yet heard back.

Accordingly, we respectfully request that parties file pre-motion letters regarding summary judgment on or before August 4, 2023.

Respectfully,

/s/ Matthew J. Henken
Matthew J. Henken

cc: Counsel of record (by ECF)